

Memorandum

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AUG 12 1983To : Simon Cordova
Sacramento

Date : August 11, 1983

DIVISION OF OIL & GAS
COALINGASubject: Resume of Injection
Surveillance Committee
Meeting of August 9, 1983From : Department of Conservation—
Division of Oil and Gas

Place: Bakersfield

Attendees: Brannon, Habel, Hauser, Koller, Lande, Mitchell, Van Matre

The meeting commenced at 10:00 a.m.

1. Review of Minutes from Last Meeting and Headquarters Response

- a. The minutes of the April 26, 1983 meeting were read and discussed in coordination with the June 28 Memorandum from Si Cordova regarding proposed changes in the MOI and regulations. No additional changes were proposed at this meeting.

2. Memorandum of Agreement (C.D.O.G. / EPA)

- a. Various regional offices of the RWQCB have requested that more geologic data be transmitted to them in conjunction with the UIC applications. It was unanimously agreed that this would be done.
- b. It was pointed out that all applications should be forwarded to the RWQCB regardless of whether or not the application will be approved by the D.O.G..
- c. There was some indication that possible changes to the MOA would be discussed during a December, 1983 meeting between Headquarters and the EPA.
- d. Members of the Injection Committee have reviewed the draft EPA Reporting Forms and expressed some inquiries. It was recommended that the Committee meet with Sacramento representatives and, if possible, EPA representatives during the next meeting set tentatively for December 7, 1983 in Sacramento to discuss this matter.

3. "P" Reports

- a. Although it is no longer required to send copies of "P" reports to the RWQCB, some districts continue to do so at the specific request of the Regional offices. It was agreed that these requests should be honored if possible.
- b. As an aid to district engineers, the base of fresh water should be included on "P" reports, particularly on wildcat wells where abandonment programs may be required during non-office hours.
- c. Most districts are still experiencing difficulty in getting operators to post our "P" reports at the well site. These operators are being issued deficiencies.

4. Guerard's Injection Manual and Dosch's Program

- a. Comments on Bill Guerard's Water Injection Manual have been submitted to Sacramento. Comments on Murray Dosch's proposed program have been requested of

Committee members to present at the next meeting for possible inclusion in the MOI.

5. Miscellaneous Topics

- a. Fracture pressures were again discussed with the final consensus being that, without step-rate test data available, each district has a conservative method of insuring that no formation damage is occurring.
- b. The question of running injection surveys on low volume, low pressure, shallow wells was touched on briefly and will be discussed in greater length at the next session.
- c. "I" reports on disapproved surveys will be issued when appropriate.
- d. The "area of review" of new injection projects varies with the specifics of the proposal. The methods and reasoning behind these variations will be reviewed by each district at the December meeting.
- e. Cement squeezes above injection zones and base of fresh water in uncemented wells was briefly discussed. In all cases, the minimum 100 lineal feet behind pipe requirement is being met.

The meeting adjourned at 1:30 p.m. . The next meeting is scheduled for Wednesday, December 7, 1983, in Sacramento. Recording secretary for this meeting was D. Mitchell.



David Mitchell
Committee Member

cc: E. Brannon
R. Hauser
A. Koller
D. Lande
M. Stettner
V. Van Matre ✓

Memorandum

To : Members, Injection Surveillance Committee

Date : June 28, 1983

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COALINGADIVISION OF OIL & GAS
COALINGASubject: Resume of Injection
Surveillance Committee
Meeting, April 26, 1983From : Department of Conservation—Division of Oil and Gas
Sacramento

Following are comments and decisions on recommendations in your memo of May 11, 1983.

Item 2. Lap tests on injection wells. We concur with your recommendation that laps in injection wells should be tested by either a conventional fluid-entry test or by a pressure test, at the discretion of the Division. A section will be added to the regulations to require such testing.

Item 6. Suggested changes to Sections 42 and 43 of the MOI.

- a. Deletion of parenthetical phrase in Exhibit 43.2, Item 1. This phrase merely emphasizes that aquifers must be exempted by EPA prior to approval for injection and it should be retained.
- b. Deletion of Section 42.2A, parts 2a, 3a, 4a, and 5a. These criteria for aquifer exemption are established by EPA and must be retained.
- c. Section 42.14.2. This section requiring casing pressure tests of old wells to be converted to injection should be retained as currently worded.
- d. Section 42.6c. Copies of P-reports are no longer sent to RWQCB. This section will be clarified to show distribution. However, many engineers feel that the notes on the P-report regarding freshwater protection are a good reference and should be retained.

Item 7. Issuance of T-report disapproving surveys. We concur that a T-report should be issued when an injection survey is disapproved and is not to be rerun immediately. Section 42.14.2 will be revised to show this.

Si Cordova
Simon Cordova
Acting Chief
Division of Oil and Gas

cc: All Deputies *R. Curtin*
D. Lande
D. Stockton
B. Ingram
B. Reid